

ORIGINAL

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268**

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**Mailing Online Services**  
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**Docket No. MC98-1**

**FIRST SET OF INTERROGATORIES OF PITNEY BOWES INC.  
TO USPS WITNESS SECKAR  
(PB/USPS-T2-1-2)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,



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DC1:78348



PB/USPS-T2-1      You indicate in your response to OCA/USPS-T5-10(b) that some of the costs shown in Table 14 of Exhibit A to your testimony have not yet been incurred. Which costs are these?

PB/USPS-T2-2      Should you also have treated as fixed costs some of the costs reported in Table 15 to Exhibit A of your testimony because they do not vary with projected increases in volume over the five year period for which you report estimates, e.g., technical help desk manager, processing center system manager and the like? If not, why not?

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 26 1998

Ian D. Volner  
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